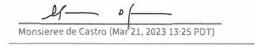
Honorable Marsha J. Pechman 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 DEREK TUCSON, ROBIN SNYDER, No. 2:23-cv-00017-MJP MONSIEREE DE CASTRO, and ERIK 9 MOYA-DELGADO, DECLARATION OF MONSIEREE DE 10 CASTRO IN SUPPORT ON MOTION FOR Plaintiffs. PRELIMINA RY INJUNCTION 11 V. 12 CITY OF SEATTLE, ALEXANDER 13 PATTON, TRAVIS JORDAN, DYLAN NELSON, JOHN DOES (#1-4), and JANE 14 DOES (#1-2) Defendants. 15 16 17 I, Monsieree de Castro, declare: 18 1. I am over the age of 18 and am competent to testify. I am a Plaintiff in the above 19 captioned matter. I have personal knowledge of the following. 20 2. On January 1, 2021, the defendants arrested me for temporary, removable writing on the 21 concrete barrier blocking the sidewalk outside of the Seattle Police Department's East 22 Precinct building. The messages I wrote were political in nature, and intended to garner 23 solidarity and fight against injustices. 24 3. My chalking was intended to be seen people in the vicinity of the East Precinct building, 25 including government officials like police officers and the general public. 26 27 DECLARATION OF MONSIEREE DE CASTRO IN SUPPORT ON MOTION FOR PRELIMINARY INJUNCTION - 1

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- 4. Prior to January 1, 2021 I regularly used sidewalk to write messages of political protest on public sidewalks. I have also chalked artwork on the public sidewalk at block parties.
- 5. After January 1, 2021 the threat of arrest for chalking is always on my mind, especially about chalking on political topics. I reduced my use of chalk after the January 1 arrest because it was clear I would be targeted based on my political message, especially around government buildings or in the presence of police officers. I believe I am at risk of arrest every time I chalk.
- 6. If the City was prohibited from arresting or jailing me for chalking like it did on January 1, 2021, I would again feel comfortable using chalk to express political beliefs near government buildings and in the presence of police officers.
- 7. In response to this lawsuit, I understand the City recently amended the ordinance I was arrested under. I have reviewed the language of the amended ordinance, which does not alleviate my fear of arrest for chalking.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

DATED this 21 day of March, 2023, at Seattle, Washington.



Monsieree de Castro

1 CERTIFICATE OF SERVICE 2 I hereby certify that on this date I electronically filed the foregoing document with the 3 Clerk of the Court using the CM/ECF system, which will send notification of such filing to the 4 following individuals: 5 6 Attorneys for Defendants 7 Ann Davison Seattle City Attorney 8 Jessica Leiser, WSBA#49349 9 Assistant City Attorney Email: Jessica.leiser@seattle.gov 10 Kerala Cowart, WSBA #53649 11 Assistant City Attorney Email: kerala.cowart@seattle.gov 12 Seattle City Attorney's Office 13 701 Fifth Avenue, Suite 2050 Seattle, WA 98104 14 15 DATED this 23rd day of March, 2023, at Seattle, Washington. 16 17 18 s/Lucas Wildner Lucas Wildner, Legal Assistant 19 20 21 22 23 24 25 26 27 DECLARATION OF MONSIEREE DE CASTRO IN SUPPORT ON MOTION FOR PRELIMINARY INJUNCTION - 3

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De Castro revised declaration

Final Audit Report

2023-03-21

Created:

2023-03-20

By:

Lucas Wildner (lucasw@mhb.com)

Status:

Signed

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"De Castro revised declaration" History

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